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*Plaintiff in pro per*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ  
BOLBOL, individually,  
  
PLAINTIFFS.

v.

ROWELL RANCH RODEO, INC.;  
HAYWARD AREA RECREATION AND  
PARK DISTRICT; HAYWARD AREA  
RECREATION AND PARK DISTRICT  
PUBLIC SAFETY MANAGER/RANGER  
KEVIN HART; ALAMEDA COUNTY  
SHERIFF'S OFFICE; ALAMEDA  
COUNTY DEPUTY SHERIFF JOSHUA  
MAYFIELD; and DOES 1 and 2, in their  
individual and official capacities, jointly and  
severally,

DEFENDANTS.

Case No. 3:23-cv-01652-VC

**[PROPOSED] ORDER GRANTING  
PLAINTIFF DENIZ BOLBOL'S  
MOTION FOR SANCTIONS  
AGAINST DEFENDANT ROWELL  
RANCH RODEO, INC. PURSUANT  
TO THE COURT'S INHERENT  
POWERS**

Judge: Hon. Vince Chhabria  
Dept: Courtroom 5 – 17th Floor  
Hearing Date:  
Hearing Time:

1           Considering the papers and arguments, and finding good cause, Plaintiff Deniz Bolbol's  
2 Motion for Sanctions against Defendant Rowell Ranch Rodeo, Inc. is GRANTED.

3           This Court finds that Defendant Rowell Ranch Rodeo, Inc. acted in bad faith by failing to  
4 adhere to the Federal Rules of Civil Procedure. Defendant Rowell Ranch Rodeo Inc. and  
5 Defendant's counsel made statements in verified responses to discovery that were purposefully  
6 false and such false statements constitute perjury, for which this Court has the inherent power to  
7 levy sanctions for attorney's fees and costs Plaintiff Deniz Bolbol incurred as a direct result  
8 thereof.

9           Accordingly, Defendant Rowell Ranch Rodeo shall pay sanctions in the amount of  
10 \_\_\_\_\_ to Plaintiff Deniz Bolbol within 30 days of the date of this Order.

11  
12 IT IS SO ORDERED.

13 Date: \_\_\_\_\_

14 THE HONORABLE VINCE CHHABRIA  
15 UNITED STATES DISTRICT JUDGE  
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